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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

LISAMARIA MARTINEZ,

Plaintiff,

v.

**COUNTY OF ALAMEDA, MELISSA
WILK**, in her individual capacity, **EVA HE**,
in her individual capacity, **MARIA LAURA
BRIONES**, in her individual capacity,

Defendants

Case No. 3:20-cv-06570-TSH

PROPOSED JURY VERDICT FORM

JURY VERDICT FORM

Question 1:

Did Plaintiff Lisamaria Martinez prove by a preponderance of the evidence that Defendant County of Alameda violated Title II of the ADA by failing to provide an auxiliary aid or service she required to file her FBNS form on March 29, 2019 at the Oakland facility?

Yes _____

No _____

Question 2:

Complete question 2 only if the answer to Question 1 was "Yes." If you answered "No" to question 1, you do not need to proceed to the remaining questions.

What is the amount of damages that Plaintiff Lisamaria Martinez has proved by a preponderance of the evidence as a result of Defendant County of Alameda's conduct?

If you answered "'Yes" to question 1, then Ms. Martinez must be awarded at least \$1 in nominal damages.

\$ _____

Question 3:

Complete question 3 only if the answer to Question 1 was "Yes." If you answered "No" to question 1, you do not need to proceed to the remaining questions.

1 Did Plaintiff Lisamaria Martinez prove by a preponderance of the evidence that Defendant
2 County of Alameda's violation of Title II of the ADA was willful or deliberately indifferent to her
3 federally protected rights when she visited the CRO on March 29, 2019?

4
5 Yes _____ No _____

6
7 **Question 4:**

8 ***Complete question 4 only if the answer to Question 1 was "Yes." If you answered "No" to***
9 ***question 1, you do not need to proceed to the remaining questions.***

10
11 Did Plaintiff Lisamaria Martinez prove by a preponderance of the evidence under California
12 Government Code § 11135 that Defendant County of Alameda's CRO is either of the following:

- 13 (1) funded directly by the state; or
14 (2) receives any financial assistance from the state?

15
16 Yes _____ No _____

17
18 **Sign & Date**

19 Once you have completed the entire verdict form, please sign and date it below:

20
21 WE, the jury, unanimously answered the preceding questions according to our deliberations.

22
23
24 Dated: _____

25 Foreperson

26
27
28